

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 19-cv-12497-PBS

**GEOFFREY TAMMARO and MEGAN
TAMMARO,**

Plaintiffs

v.

**GARVIN MCRAE, MARK ASSAD,
KEVIN SMITH, CHRISTOPHER
SIMPSON, and BOSTON POLICE OFF.
JOHN DOE,**

Defendants.

**PLAINTIFFS' ASSENTED-TO MOTION TO EXTEND DEADLINE FOR FILING OF
MOTION IN LIMINE RELATED TO EXPERT TESTIMONY OF CHARLES
DICHIARA**

Now come Plaintiffs Geoffrey Tammaro and Megan Tammaro and respectfully request that this Honorable Court extend the deadline for filing motions in limine regarding proposed expert testimony to July 2, 2021. As grounds for this motion, Plaintiffs state:

1. On March 4, 2020, the Court issued an "Order for Pretrial Conference." (Dkt. No. 22.)
2. Pursuant to that order, motions in limine regarding proposed expert testimony were due at least 30 days prior to the pretrial conference.
3. On May 6, 2021, the parties appeared for a status conference and the Court scheduled the final pretrial conference for July 15, 2021.
4. On that same day, the Court allowed the Defendants' assented-to motion to deadline expert the deadline for making expert disclosures and the taking of expert depositions. (Dkt. No. 45.)

5. The Defendants subsequently provided undersigned counsel with a report from Charles DiChiara.
6. Mr. DiChiara was subsequently deposed and the parties expert to receive a transcript of the deposition at the beginning of the upcoming week.
7. Plaintiffs wish to file a motion in limine regarding Mr. DiChiara's proposed testimony but need a copy of the transcript of his deposition to do so.
8. All other motions in limine are due on Thursday, July 1, 2021.
9. Plaintiffs wish to file their motion regarding Mr. DiChiara by the close of business on that date.
10. Undersigned counsel has conferred with Assistant Corporation Counsel John Fahey and he has graciously assented to this request.

Based on the foregoing, Plaintiffs request that the deadline for the filing of motions in limine regarding proposed expert testimony be extended to July 1, 2021.

Respectfully submitted,

PLAINTIFFS GEOFFREY TAMMARO
MEGAN TAMMARO,

By their attorney,

/s/ Luke Ryan
Luke Ryan, Esq. BBO# 664999
Sasson, Turnbull, Ryan and House
100 Main Street, 3rd Floor
Northampton, MA 01060
(413)586-4800
lryan@strhlaw.com

7.1 Certification

Undersigned counsel certifies that on June 23, 2021, pursuant to LR, D. Mass. 7.1(a)(2), counsel for Plaintiffs conferred with counsel for Defendants who assented to the allowance of the foregoing motion.

Date: 6/25/21

/s/ Luke Ryan
Luke Ryan

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

Date: 6/25/21

/s/ Luke Ryan
Luke Ryan